

WHEREFORE, Movant requests admission of Eric J. Feder *pro hac vice* as representative of Defendants Sacha Noam Baron Cohen, Showtime Networks Inc., and CBS Corporation in this proceeding.

Dated this 15th day of March, 2019.

Respectfully submitted,

/s/ Lisa B. Zycherman

Lisa B. Zycherman (D.C. Bar No. 495277)
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CERTIFICATE OF SERVICE

I hereby certify that, on the date below, I caused the foregoing MOTION TO ADMIT ERIC J. FEDER *PRO HAC VICE*, DECLARATION OF ERIC J. FEDER, and PROPOSED ORDER to be served via ECF on the following persons:

Larry E. Klayman
Klayman Law Group, P.A.
7050 W. Palmetto Park Road, #15-287
Boca Raton, FL 33433
Email: leklayman@gmail.com

Dated: March 15, 2019

/s/ Lisa B. Zycherman

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

**ROY STEWART MOORE and KAYLA
MOORE,**

Plaintiffs,

v.

**SACHA NOAM BARON COHEN,
SHOWTIME NETWORKS, INC., AND
CBS CORPORATION,**

Defendant.

Civil Action No. 1:18-cv-02082

**DECLARATION OF ERIC J. FEDER IN SUPPORT OF IN SUPPORT OF MOTION
FOR *PRO HAC VICE* APPEARANCE**

I, Eric J. Feder, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. My full name is Eric Joel Feder. I am an attorney with the law firm of Davis Wright Tremaine LLP and I am seeking to appear *pro hac vice* as a lawyer for Defendants Sacha Noam Baron Cohen, Showtime Networks Inc., and CBS Corporation in the above-captioned matter pending before the District Court for the District of Columbia.

2. My office address is 1919 Pennsylvania Ave, NW, Washington, DC, and my office telephone number is 202-673-4273.

3. I was admitted to practice law in the State of New York in March 2008 and remain licensed and in good standing in New York. My New York licensure/registration number is 4591301. I was admitted to practice law in the District of Columbia in September 2017, and remain licensed and in good standing in the District of Columbia. My D.C. licensure/registration number is 1048522. In addition to the New York state courts and the courts of the District of Columbia, I am admitted to practice and am in good standing in the following courts: the U.S.

Court of Appeals for the Second Circuit and the U.S. District Courts for the Southern and Eastern Districts of New York.

4. I certify that I have never been disciplined or sanctioned by any bar.

5. I have not been admitted *pro hac vice* in this Court in the last two years.

6. On March 13, 2019, I submitted an application for admission to the Bar of this Court, which is currently pending.

7. I previously entered an appearance in this Court as counsel for defendants in this case, because I had misunderstood my eligibility to practice in this Court.

8. For the first eight years of my career as an attorney, I practiced in New York, including for several years in the New York office of Davis Wright. I moved to the D.C. area in Fall 2016, and transferred to the D.C. office of Davis Wright at that time. Earlier in 2016, prior to my transfer, I had been admitted *pro hac vice* to this Court in connection with a different case.

9. Within less than 90 days of beginning work in the D.C. office of Davis Wright, I applied for admission to the Bar of the District of Columbia (the “D.C. Bar”). I became a member of the D.C. Bar on September 7, 2017.

10. Upon my gaining membership to the D.C. Bar, I registered to file documents in this Court via the Court’s ECF system, providing my D.C. Bar number, as the registration form requires. I was subsequently granted ECF credentials and informed that I was permitted to file papers in this Court. At that time, I mistakenly believed I was a member of the Bar of this Court by virtue of my admission to the D.C. Bar and my being granted ECF credentials in this Court. I now understand that my ECF credentials were, in fact, linked to my prior *pro hac vice* admission, and I had not yet been separately admitted to the Bar of this Court.

11. On September 28, 2018, I entered an appearance as counsel for Defendants in this

case based on my good faith belief that I was permitted to do so. I also sponsored motions for admission *pro hac vice* for two of my colleagues from the New York office of Davis Wright, Elizabeth A. McNamara and Rachel F. Strom (*see* ECF Nos. 7, 8). Those motions were granted by the Court on November 14, 2018.

12. This week, I learned that I was not, in fact, properly admitted as a member of the Bar of this Court. Upon my learning this, my colleague, Lisa B. Zycherman, a member of the Bar of this Court, entered an appearance on behalf of Defendants in the case. It is my understanding that Ms. Zycherman will be filing Errata notices to indicate that my name and contact information should be replaced on all of the papers filed for defendants to date in the case. In addition, Ms. Zycherman will be filing a *nunc pro tunc* motion for the Court to permit the prior filings to remain on the docket as corrected by the Errata notices. Ms. Zycherman is also sponsoring new motions for admission *pro hac vice* for Ms. McNamara and Ms. Strom.

I declare under the penalty of perjury pursuant to 28 U.S.C. 1746 that the foregoing is true and correct.

EXECUTED this 15th day of March 2019


ERIC J. FEDER

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DISTRICT OF COLUMBIA

ROY STEWART MOORE and)	
KAYLA MOORE,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 1:18-cv-02082
)	
SACHA NOAM BARON COHEN,)	
SHOWTIME NETWORKS, INC., and)	
CBS CORPORATION,)	
)	
Defendants.)	

PROPOSED ORDER

Upon consideration of Defendants' motion for admission of attorney Eric J. Feder *pro hac vice*, it is

ORDERED that Defendants' motion is granted and attorney Eric J. Feder is granted admission *pro hac vice* as counsel for Defendants Sacha Noam Baron Cohen, Showtime Networks Inc., and CBS Corporation in this proceeding.

Dated this ____ day of _____, 2019.

Hon. Thomas F. Hogan
United States District Judge